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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BETTY UNCANGCO, Plaintiff,) Case No.: 2:14-cv-00994-APG-CWH
vs.) UNOPPOSED MOTION TO AMEND
CAROLYN W. COLVIN, Acting) AND EXTEND BRIEFING
Commissioner of Social Security,) SCHEDULE
Defendant)

Plaintiff, Defendant, and the Court, through their undersigned counsel of record, hereby stipulate, subject to the approval of the Court, to extend the time for Plaintiff to file Plaintiff's Motion for Reversal and/or Remand to January 23, 2015; and that Defendant shall have until February 23, 2015, to file her opposition, if any is forthcoming. Any reply by plaintiff will be due March 9, 2015.

1 An extension of time is needed because Plaintiff's Counsel's Spouse
2 undergoes chemotherapy treatment for her Stage IV breast cancer which
3 metastasized initially to her liver and continues to progress there and in her lungs,
4 throat, and spine which required recent hospitalization to treat. Counsel requires the
5 additional time to file the Motion for Reversal and/or Remand to allow him to
6 devote the appropriate time to assist his Spouse and his two elementary school aged
7 children through this obviously stressful experience. Counsel sincerely apologizes
8 to the court for any inconvenience this may have had upon it or its staff.

9 Counsel for defendant has indicated, via e-mail, that this motion to extend
10 the time to file is not opposed.

11 | DATE: December 1, 2014, Respectfully submitted,

ROHLFING & KALAGIAN, LLP

/S/ Marc V. Kalagian

BY: _____
Marc V. Kalagian
Attorney for plaintiff BETTY UNCANGCO

ORDER

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED: December 3, 2014